UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

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Plaintiff,

Civil Action No. 2:15-cv-00752-RWS-RSP

v.

Frontier Airlines, Inc.,

Defendant.

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Loramax LLC and Defendant Frontier Airlines, Inc. have settled all matters in controversy between them, in principle. The parties are in the process of finalizing a settlement agreement, are carrying out their respective obligations under the anticipated settlement agreement in the next few days, and expect to promptly file a stipulated dismissal.

Accordingly, the parties jointly move the Court to stay the above-captioned case and any and all attendant deadlines for thirty (30) days to allow the appropriate dismissal papers to be submitted. A docket control order has not been entered in this matter.

Dated: November 3, 2015 Respectfully submitted,

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ATTORNEYS FOR DEFENDANT FRONTIER AIRLINES, INC.

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on Tuesday, November 03, 2015 with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/Jennifer P. Ainsworth
Jennifer P. Ainsworth

CERTIFICATE OF CONFERENCE

This is to certify that counsel have conferred concerning this Joint Motion and this Joint Motion sets out the Parties' positions.

/s/ Jennifer P. Ainsworth
Jennifer P. Ainsworth